

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOHN DEWEES,

Plaintiff,

Civil Action No. 16-cv-8828

- against -

COMPLAINT

WAVETRUE, INC.,

Defendant.

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Plaintiff JOHN DEWEES, by his attorneys, Meltzer, Lippe, Goldstein & Breitstone, LLP, sets forth the following as and for his Complaint against Defendant WaveTrue, Inc:

1. Plaintiff is a natural person residing at 36 Symor Drive, Morristown, New Jersey 07960.
2. Defendant is a corporation organized under the laws of the State of Delaware having a place of business located at 174 Hudson Street, 4th Floor, New York, New York 10013.
3. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1332, as the parties are completely diverse in citizenship.
4. Venue is appropriate in this Court pursuant to 28 U.S.C. § 1391(b)(2), as all actions comprising the claims for relief occurred within this judicial district.
5. During the period on or about January 27, 2014 to and including on or about October 18, 2016, Plaintiff made loans to Defendant in the aggregate principal sum of \$691,696.30 (collectively referred to hereinafter as the “Loans”).
6. Each of the Loans has matured.
7. Payment of the Loans has been demanded.

8. Defendant has failed and refused to pay Plaintiff any part of the amount due with respect to the Loans.

9. The unpaid principal balance of the Loans is \$691,696.30.

10. Accordingly, Defendant owes Plaintiff the principal sum of \$691,696.30 pursuant to the Loans.

11. Based on the foregoing, Plaintiff is entitled to a money judgment in his favor against Defendant in the total amount of \$691,696.30:

WHEREFORE, Plaintiff John DeWees respectfully demands judgement against Defendant WaveTrue, Inc. as follows:

- a. A money judgment in his favor against Defendant WaveTrue, Inc. in the amount of \$691,696.30; and
- b. Such other and further relief as to the Court seems just and proper under the circumstances.

Dated: Mineola, New York
November 14, 2016

MELTZER, LIPPE, GOLDSTEIN & BREITSTONE, LLP

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